

# EXHIBIT 2

GVI BY JEAN-PIERRE ORIOL 30(b)(6), Confidential  
Gov. U.S. Virgin Islands vs JPMorgan Chase

July 07, 2023

1

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK  
3 CASE NO. 22-CV-10904

4 -----x  
5 GOVERNMENT OF THE UNITED STATES V.I.,

6 Plaintiff,

7 vs.

8 JPMORGAN CHASE BANK, N.A.,

9  
10 Defendant.  
11  
12 -----x  
13  
14 \*\*\*CONFIDENTIAL\*\*\*  
15  
16 July 7, 2023  
17  
18 Confidential Remote Video-Recorded  
19  
20 30(b)(6) Deposition of  
21 GVI BY JEAN-PIERRE ORIOL  
22  
23 Stenographically Reported By:  
24 Mark Richman, CSR, CCR, RPR, CM  
25 Job No. J9913116

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2           page.

3           MR. ACKERMAN: Okay.

4           A. No, nothing privileged.

5           Q. Okay. Could you read in that  
6 half page of notes, just read it aloud,  
7 please.

8           A. Sure. The --

9           MR. ACKERMAN: Objection. You  
10 can go ahead.

11          A. Lieutenant Shelly-Ann Cannonier,  
12 she's currently the director of  
13 investigations for VIPD for the last two  
14 and a half years. She's been with the  
15 VIPD for 26 years. If the complaint was  
16 lodged with VIPD a case number would  
17 have been developed and generated. VIPD  
18 asserts that there have been no  
19 complaints made.

20          And then for me, what my  
21 understanding of this proceeding is, is  
22 that I'm prepared to answer questions on  
23 investigations and investigation  
24 monitoring steps.

25          Q. Is that all the notes?

01:13

01:13

01:13

01:14

01:14

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2 after the Easter season when there's  
3 camping and there's people still living  
4 in tents and coordinating with them  
5 trying to move people off of the beaches  
6 and such.

01:16

7           That's one example.

8 Q.       How regular is your contact with  
9 the VIPD?

01:16

10 MR. ACKERMAN: Objection to form.

11 A.       Not regular at all.

12 Q.       Have you gathered information  
13 through your contact with VIPD that is  
14 relevant in any way to this suit?

01:17

15 MR. ACKERMAN: Objection to form.

16 A.       I don't understand the question.

17 Q.       So my question is you've done  
18 some amount to prepare for this  
19 testimony, for your testimony today by  
20 talking to VIPD. Setting that aside, as  
21 part of your regular work for DPNR, have  
22 you gathered any information from VIPD  
23 that is responsive to the topic you're  
24 designated on today?

01:17

25 MR. ACKERMAN: Objection to form.

01:17

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2       A.     I would say yes.

3       Q.     What sort of information?

4       A.     Well, we in preparation for today  
 5     asked them if they had any knowledge or  
 6     any information about any complaint  
 7     being made with respect to Mr. Epstein,  
 8     you know, from the, from either of the  
 9     islands, and the answer was no.

01:17

10      Q.     Okay. And aside from that  
 11     interview that you've done, have you  
 12     ever learned of any information from  
 13     VIPD that has to do with Epstein?

01:18

14      A.     No.

15           MR. ACKERMAN: Objection to form.

01:18

16      Q.     Have you been deposed before?

17      A.     Yes.

18      Q.     And was that in this case?

19      A.     One of them.

20      Q.     How many other depositions have  
 21     there been?

01:18

22      A.     Six or seven.

23      Q.     Can you describe them generally?

24      A.     Similar to now, asking questions,  
 25     me answering yes, no, all of them

01:19

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2       A.     No.

3       Q.     What else did you ask her?

4       A.     We asked if -- about any records,  
5 any requests that were made about any  
6 investigations. She indicated that she  
7 had spoken to the prior staff in the  
8 office. They were looking for if any  
9 complaints were made and she did not  
10 come across any complaints having been  
11 filed for them to initiate an  
12 investigation.

01:25

01:25

01:25

13      Q.     What else did you ask her?

14      A.     How long she had been in the  
15 position, how long she had been with the  
16 VIPD.

01:25

17      Q.     What were the answers to each of  
18 those questions?

19      A.     Again, she had been in the -- in  
20 the division as the director for the  
21 last two and a half years. She had been  
22 with the VIPD now 26 years. And then we  
23 asked about the process for if like what  
24 typically happens when somebody reaches  
25 out or files a complaint. So she

01:25

01:26

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2 indicated that the VIPD would, in  
3 opening up an investigation from a  
4 complaint, it's assigned a case number  
5 and then there would be follow-up       01:26  
6 investigations.

7           But that in her research, that  
8 there had not been any complaint filed,  
9 and therefore there was no, there was no  
10 case number generated or anything of      01:26  
11 that nature to suggest that there was  
12 any investigation.

13 Q.       What other questions did you ask  
14 her?

15 A.       That was really it.                  01:26

16 Q.       Beyond your conversation with  
17 Lieutenant Cannonier, did you speak with  
18 anyone else to prepare to testify on  
19 this topic today?

20 A.       Only my attorneys.                  01:27

21 Q.       And what -- how often did you  
22 meet with them?

23 A.       For this second deposition?  
24 Once.

25 Q.       For how long?                        01:27

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2 Q. And no, during that 20 year span,  
3 no complaints were received regarding  
4 Epstein, correct?

5 A. That's correct.

6 Q. Beyond formal complaints, do you  
7 know if there were any interactions  
8 between VIPD and Epstein during that  
9 20-year period?

01:32

01:32

MR. ACKERMAN: Objection.

A. No --

MR. ACKERMAN: Hold on,

Commissioner, let me just get my objections in. Objection, scope, form. Go ahead.

01:32

A. No, I do not.

Q. Do you know if VIPD had any interaction with Epstein's companies?

MR. ACKERMAN: Objection, scope,

form.

21 22

A. No, I do not.

01 · 33

Q. Let's pull up tab 40 and enter it as exhibit 1

(Exhibit 1, document produced to  
begin by the USVI titled 2010



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2           VI-JPM-000079601 was marked for  
3           identification.)

4           A.     Okay.

5           Q.     This is an email chain that           02:03  
6           starts with a July 16, 2019 email from a  
7           Curt Devine of CNN.com and it asks  
8           certain questions of the VI Police  
9           Department including "Has US Virgin  
10          Islands Police Department participated       02:03  
11          in (or been asked to participate in) any  
12          investigation related to Mr. Jeffrey  
13          Epstein?"

14           Do you see that?

15           A.     Yes.                                   02:03

16           Q.     Do you know what the answer to  
17          that question is?

18           A.     Has the US Virgin Islands Police  
19          Department received any complaints? So,  
20          again, from what was reported to me,       02:03  
21          that there were no complaints.

22           Q.     Sorry, I was focused on the  
23          second question which is has US Virgin  
24          Islands police participated in or been  
25          asked to participate in any                       02:04

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2       Q.     So this is a response by Glenn  
3           Dratte to the CNN reporter and he's  
4           reporting, "I did a complete check with  
5           the VIPD criminal investigations bureau  
6           and no complaints has been filed against  
7           Mr. Jeffrey Epstein with the Virgin  
8           Islands Police Department. If there's  
9           anything further I can assist please  
10          reach out to my office."

02:06

02:06

11           Do you see that?

12       A.     Yes.

13       Q.     So that is the answer as of July  
14          18, 2019.

02:06

15           Do you know if subsequent to that  
16          date there was any investigation?

17           MR. ACKERMAN: Objection, scope,  
18          form.

02:06

19       A.     No, I do not know. Or at least  
20          what was reported to me was that there  
21          was no investigation. There is no case  
22          number that has been assigned with  
23          anything related to Mr. Epstein, so --

24       Q.     And that's -- that's --

25       A.     So I would say no.

02:07